

## **EXHIBIT C**

**From:** ncoppinger@bdlaw.com  
**To:** "toreilly@toxicorts.org"  
**Cc:** DKrainin@bdlaw.com; "skauff@lojkd.com"; "WPetit@jgdpc.com"; "JGilmour@jgdpc.com"; "BJackson@jgdpc.com"; "dmiller@toxicorts.org"; "maxline@toxicorts.org"; "dboone@toxicorts.org"; "clopez@toxicorts.org"; "jdema@lojkd.com"; "npshort@lojkd.com"; "jarenas@lojkd.com"; "VCardenas@jgdpc.com"; "dblum@toxicorts.org"; "toxicorts@toxicorts.org"  
**Subject:** Re: Puerto Rico MTBE: Sunoco 30b6 Deposition  
**Date:** Thursday, September 05, 2013 9:33:54 AM

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Tracey,

Having not heard back from you, we have released these dates. We will propose new dates or be happy to discuss potential dates with you shortly.

-Nessa

**From:** Nessa Horewitch Coppinger  
**Sent:** Tuesday, September 03, 2013 01:10 PM  
**To:** 'toreilly@toxicorts.org' <toreilly@toxicorts.org>  
**Cc:** Daniel M. Krainin; Scott Kauff <skauff@lojkd.com>; 'Will Petit' <WPetit@jgdpc.com>; 'John Gilmour' <JGilmour@jgdpc.com>; 'Bill Jackson' <BJackson@jgdpc.com>; "Duane Miller" <dmiller@toxicorts.org>; "Mike Axline" <maxline@toxicorts.org>; Daniel Boone <dboone@toxicorts.org>; Cynthia Lopez <clopez@toxicorts.org>; 'Jack Dema' <jdema@lojkd.com>; 'Nathan Short' <npshort@lojkd.com>; Justin J. Arenas <jarenas@lojkd.com>; 'Victor Cardenas' <VCardenas@jgdpc.com>; David Blum <dblum@toxicorts.org>; 'Miller, Axline & Sawyer' <toxicorts@toxicorts.org>  
**Subject:** RE: Puerto Rico MTBE: Sunoco 30b6 Deposition

Tracey,

We have not heard back from you with respect to the dates offered more than three weeks ago for the 30(b)(6) notice issued to Sunoco, despite your email a week ago saying you would respond by COB the following day. As the deposition dates offered have been held for more than three weeks, and the dates are now two weeks away, if we do not hear from you confirming the dates by COB tomorrow, Wednesday, September 4<sup>th</sup>, we will release the offered dates of September 19<sup>th</sup> and 20<sup>th</sup>. In that case, we will discuss with you other possibilities for deposition dates.

-Nessa

Nessa Horewitch Coppinger  
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**From:** Tracey O'Reilly [mailto:[toreilly@toxic torts.org](mailto:toreilly@toxic torts.org)]  
**Sent:** Tuesday, August 27, 2013 3:06 PM  
**To:** Nessa Horewitch Coppinger  
**Cc:** Daniel M. Krainin; Scott Kauff; 'Will Petit'; 'John Gilmour'; 'Bill Jackson'; "Duane Miller"; "Mike Axline"; Daniel Boone; Cynthia Lopez; 'Jack Dema'; 'Nathan Short'; Justin J. Arenas; 'Victor Cardenas'; David Blum; 'Miller, Axline & Sawyer'  
**Subject:** RE: Puerto Rico MTBE: Sunoco 30b6 Deposition

Ms. Horewitch Coppinger:

Please hold those dates and we will provide you with a response by close of business tomorrow.

Sincerely,

Tracey L. O'Reilly  
Miller, Axline & Sawyer  
1050 Fulton Avenue, Suite 100  
Sacramento, California 95825  
Tel: 916-488-6688  
Fax: 916-488-4288  
Email: [toreilly@toxic torts.org](mailto:toreilly@toxic torts.org)

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**From:** Nessa Horewitch Coppinger [<mailto:NCoppinger@bdlaw.com>]  
**Sent:** Tuesday, August 27, 2013 1:57 PM  
**To:** [toreilly@toxic torts.org](mailto:toreilly@toxic torts.org)  
**Cc:** Daniel M. Krainin  
**Subject:** Puerto Rico MTBE: Sunoco 30b6 Deposition

Tracey,

In my letter to you dated August 9, 2013, Sunoco offered dates of September 19<sup>th</sup> and 20<sup>th</sup> for the 30(b)(6) deposition of Sunoco noticed by Plaintiffs in the Puerto Rico matter. The location for the deposition offered was Philadelphia. Can you confirm whether Plaintiffs would like to proceed with the deposition on those dates?

Thanks,  
Nessa

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